

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 19-
v.	:	DATE FILED: September 13, 2019
GREGG REILLY	:	VIOLATIONS:
		18 U.S.C. § 201 (bribery – 3 counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. R.B., a person known to the United States Attorney, resided in the Eastern District of Pennsylvania. R.B., charged elsewhere, was involved in the distribution of a controlled substance; that is, marijuana, in the Eastern District of Pennsylvania.
2. Defendant GREGG REILLY was a United States Postal Carrier employed by the United States Postal Service (“USPS”) and was therefore a “public official” as defined by Title 18, United States Code, Section 201(a)(1).
3. Defendant GREGG REILLY was a postal carrier at the Frankford Post Office, located at 4410 Paul Street, Philadelphia, Pennsylvania, and was responsible for delivering USPS packages to addresses along an assigned postal route.
4. As a postal carrier, defendant GREGG REILLY owed the USPS the duty to, among other things: (a) ensure the security and integrity of the mail; (b) safeguard the mail against use by individuals and enterprises engaged in criminal activity, including trafficking in narcotics; (c) deliver the mail to the specified addressee; (d) handle undeliverable mail in

accordance with USPS policies and regulations; and (e) correctly and accurately record the delivery of each USPS package sent via Priority Mail.

5. Defendant GREGG REILLY used his official position with USPS to support the illicit transportation and delivery of packages containing marijuana to R.B.

6. The marijuana packages were mailed via USPS mail service from California and Arizona and addressed to fictitious names and addresses on a postal route covered by the Frankford Post Office in Philadelphia Pennsylvania, including the route assigned to defendant GREGG REILLY.

7. Defendant GREGG REILLY met with R.B. at various locations near defendant REILLY's postal route.

8. Defendant GREGG REILLY received cash from R.B. in exchange for delivering the marijuana packages.

9. On or about October 16, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GREGG REILLY,

being a public official, directly and indirectly, corruptly demanded, received, accepted and agreed to receive and accept a thing of value in return for being influenced in the performance of an official act, and, in return for being induced to do and omit to do any act in violation of his official duties, that is, defendant GREGG REILLY demanded, sought, received, accepted, and agreed to receive and accept cash from R.B. in return for the diversion of USPS packages from the addressee to R.B. for the purpose of the distribution of marijuana contained within the packages.

In violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8 of Count One are incorporated herein.
2. On or about November 9, 2017, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GREGG REILLY,

being a public official, directly and indirectly, corruptly demanded, received, accepted and agreed to receive and accept a thing of value in return for being influenced in the performance of an official act, and, in return for being induced to do and omit to do any act in violation of his official duties, that is, defendant GREGG REILLY demanded, sought, received, accepted, and agreed to receive and accept cash from R.B. in return for the diversion of a USPS package from the addressee to R.B. for the purpose of the distribution of marijuana contained within the package.

In violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8 of Count One are incorporated herein.
2. On or about May 29, 2018, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GREGG REILLY,

being a public official, directly and indirectly, corruptly demanded, received, accepted and agreed to receive and accept a thing of value in return for being influenced in the performance of an official act, and, in return for being induced to do and omit to do any act in violation of his official duties, that is, defendant GREGG REILLY demanded, sought, received, accepted, and agreed to receive and accept cash from R.B. in return for the diversion of a USPS package from the addressee to R.B. for the purpose of the distribution of marijuana contained within the package.

In violation of Title 18, United States Code, Sections 201(b)(2)(A) and (C).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation(s) of Title 18, United States Code, Section 201, as set forth in this information, defendant

GREGG REILLY

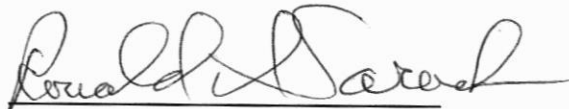
shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violation(s).

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code,
Section 981(a)(1)(C).


for WILLIAM M. MCSWAIN
United States Attorney